

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
vs.)	NO. 07-CR-50058-2
)	
MICHAEL JACKSON,)	
)	MOTION TO RECONSIDER
Defendant.)	ORDER OF DETENTION

NOW COMES the Defendant herein, MICHAEL JACKSON, by and through his counsel of record, The Law Offices of Michael J. Phillips, and respectfully requests that this Honorable Court enter an Order reconsidering its prior Order Detaining the Defendant herein, and in support thereof, states as follows:

1. That on November 29, 2007, this Honorable Court entered an Order detaining the Defendant pending trial herein, and this Honorable Court indicated that he might reconsider said Order For Detention if the state criminal charges against the Defendant then pending in the Winnebago County Circuit Court were no longer pending thus avoiding the need to writ the Defendant from the Winnebago County jail for each federal court appearance.

2. That since the entry of the Order For Detention, the following conditions have changed:

A. According to Attorney John Palmer who represented the Defendant in his Winnebago County criminal charges, all charges against the Defendant have been dismissed on Motion of a Winnebago County Assistant State's Attorney, and the undersigned on this date has confirmed the dismissal of all pending felony cases by examining the online court docket for Winnebago County Circuit Court and has further confirmed with the staff of the Winnebago County Corrections Administration that it has no record of any unposted bond for the Defendant; and

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B. Terrica Lee, the Defendant's girlfriend, is due to deliver the Defendant's and her first child on December 25, 2007, but has developed medical problems with the pregnancy so that she is now confined to bed at home and may have to be hospitalized within the next week and labor may have to be induced, and thus Defendant's presence at their home will assist Terrica both prior to and after the birth of their child since no other adult is present in the home during the day ; and

C. The Defendant's counsel contacted Natalie Guichard of the United States Office of Pretrial Services who confirmed the availability as of Monday, December 17, 2007, of an electronic ankle bracelet for the Defendant to wear and to pay the daily rental cost of approximately three dollars and twenty-six cents (\$ 3.26).

3. The Defendant's Mother, as stated in the Pretrial Services Report previously reviewed by this Honorable Court, is also willing to post about Two Thousand Dollars (\$ 2,000.00) in cash as security for his future appearances in federal court.

WHEREFORE, Defendant respectfully requests that this Honorable Court to reconsider its previous Order detaining the Defendant pending trial herein, and for such other and further relief as to this Honorable Court seems equitable and just.

Respectfully Submitted,

By: /s/ Michael J. Phillips
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that he served a copy of the above and foregoing document on all counsel of record herein including but not limited to Assistant United States Attorney Michael Iasparro via the District Court's Electronic Case Management system on December 11, 2007.

/s/ Michael J. Phillips